



KENAITZE
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May 24, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Rural Health Care Support Mechanism, WC Docket No 02-60
Actions to Accelerate Broadband-Enabled Health Care Solutions, GN
Docket No 16-46

Dear Chairman Pai and FCC Commissioners:

Thank you for your support of the Rural Health Care Program. As you recognized in a recent Senate Commerce Committee FCC Oversight hearing, broadband telemedicine is a critical component of addressing the health care needs of Alaskans.

In April 2014, Kenaitze Indian Tribe opened the Dena'ina Wellness Center (DWC), a long planned outpatient medical facility, to serve the medical needs of Alaska Native and American Indian people living on the Kenai Peninsula. The DWC serves more than 3,500 patients with wraparound services including primary care, behavioral health, dental, wellness, optometry, pharmacy, and many other healthcare services.

As a rural primary care facility, DWC is also heavily reliant on connected services provided by the Alaska Native Tribal Health Consortium (ANTHC) to cost effectively provide services for more specialty, emergent, and specific treatment. For these purposes, tools which require high speed connectivity such as telemedicine and radiology are essential to our operations. Also, the DWC's patient medical record system is connected to others in the state so records are easily and securely accessible by other Tribal Health Organizations (THOs) to assure accurate and expedient care. Without USAC funding, Kenaitze simply cannot provide the quality of care the USAC program was designed to support.

However, current \$400 million Rural Health Care Universal Service Support budget remains at the initial level set in 1997, despite inflation, advances in technology, and increased demand for services. The Universal Service Administrative Co. also recently announced that it exceeded the funding cap for the current 2016 fiscal year ending June 30, 2017. Applicants that filed during the Sept. 1 – Nov. 30, 2016 filing window will receive a pro-rated percentage, 92.5 percent, of the qualifying funding requested. In our case, assuming Kenaitze's funding application is approved, we will be responsible for paying approximately

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an additional \$158,000 per year, which we did not budget or anticipate, in addition to the portion of the cost of services that we are already responsible for paying under the rules of the rural health care support mechanism.

As with all THOs, Kenaitze strives to provide the best healthcare services possible with limited resources. The proposed changes in funding level creates a very difficult challenge. As a consequence, DWC would need to eliminate the equivalent of two positions, including one midlevel medical provider, a team that provides medical services for up to 1,100 individuals in our area, in order to fund the additional cost.

We ask that you take steps to ensure both the near and long-term viability of the Rural Health Care Program to meet the increased demand for telemedicine services both in Alaska and across the country. We believe that the FCC should increase the budget for the rural health care support mechanisms to reflect inflation over the past two decades, as well as increased technology and telecommunications demands due to our HIPAA legal obligations, advances in telemedicine capabilities, changes in patient expectations and standards of care, and new demands from skilled nursing facilities.

In addition, please consider implementing an inflation adjustment mechanism for the future, and short-term measures to restore qualifying funding requests filed Sept. 1 – Nov. 30, 2016 to 100 percent.

Thank you for your support of this important program.

Sincerely,



Jaylene Peterson-Nyren
Executive Director
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CC: The Honorable Senator Murkowski
The Honorable Senator Sullivan
The Honorable Congressman Young